

April 17, 2024

Dear Chair Klevorn, Vice Chair Huot, and Members of the State and Local Government Finance and Policy Committee:

We're writing in support of the A23 amendment to HF 3431DE4, which clarifies the review and approval process for comprehensive planning under the Metropolitan Council's authority and purview. The Legislature prudently recognized the interdependence of government bodies in the metro and the need for coordination among these entities "to protect the health, safety and welfare of the residents of the metropolitan area and to ensure coordinated, orderly, and economic development." Minn. Stat. § 473.851. As such, the Metropolitan Council is required to prepare a comprehensive development guide for the metropolitan area, which provides for a regional approach to planning and Local Government Units to develop comprehensive plans that are reviewed for consistency with that guide.

This process prepares the region to accommodate projected population growth and includes reviewing and analyzing both how that growth will impact the natural environment, and the infrastructure needed to support that growth. It is a policy document that sets a vision intended to guide decision making at the local level. It does not confer approval of any particular project or development or guarantee that any particular development pattern will occur. Nor is it intended to predict how real estate and development markets will respond or change over time.

A comprehensive plan is followed by other governmental or market-driven actions, at which point effective environmental review can occur, subject to MEPA, that assesses the development actually proposed and accurately projects environmental impacts. As such, comprehensive plans are exempt from environmental review under MEPA. Minn. R. 4100.4600, subs. 1, 26. Yet, some argue that requirements exist elsewhere in statute in conflict with this clear directive.

The A23 amendment to HF 3431DE4 would clarify any ambiguity that may exist in law to ensure that local governments can continue to conduct this valuable planning process without the potential for requirements that would be onerous, inappropriate, and impractical, and without any resulting benefit to the planning process or the environment. A 2018 effective date is important because all comprehensive plans currently in effect were reviewed by the Metropolitan Council beginning in 2018 and will continue to be in effect until 2030.

Sincerely,



Jacob Frey, Mayor  
Minneapolis



Nadia Mohamed, Mayor  
St. Louis Park



Mary Supple, Mayor  
Richfield



Hollies Winston, Mayor  
Brooklyn Park



Melvin Carter, Mayor  
St. Paul



Jim Hovland, Mayor  
Edina



Patrick Hanlon, Mayor  
Hopkins



Brad Wiersum, Mayor  
Minnetonka